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Michael Faillace & Associates, P.C.

Employment and Litigation Attorneys

60 East 42nd Street, Suite 4510 New York, New York 10165 Telephone: (212) 317-1200 Facsimile: (212) 317-1620

July 3, 2019

VIA ECF AND EMAIL

Hon. Analisa Torres United States District Judge United States District Court Southern District of New York 500 Pearl Street New York, NY 10007

Re:

Moreira et al v. J&I Thai Inc., et al

Case No. 18-cv-3261 (AT)

Dear Judge Torres:

This office represents Plaintiff Juan C. Moreira in the above-referenced matter. Plaintiff respectfully request an extension to August 1, 2019 of today's deadline to file the settlement agreement and request for approval of the settlement. Defendant Phannita Yitho, the sole remaining defendant, consents to the extension.

We ask for the extension because we have been unable to finalize and execute the revised settlement agreement to date. I have sent the revised settlement agreement to Defendant Phannita Yitho for her review. We anticipate that both sides will execute the revised agreement in approximately the next ten days, but respectfully ask for an extension to August 1 in order to leave room for unexpected delays. This is the first request for an extension of this deadline.

I thank the Court for its time and attention to this matter.

Respectfully Submitted,

/s/ Joshua S. Androphy
Joshua S. Androphy
Michael Faillace & Associates, P.C.
Attorneys for Plaintiff